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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDERSON SAM BONILLA ECHEGOYEN,
aka "Anderson Samuel
Bonilla,"
aka "Anderson Sam Echegoyen,"
aka "Anderson Sam Bonilla-
Echegoyen,"

Defendant.

No. CR 18-00876-SJO

STIPULATION REGARDING REQUEST
FOR (1) CONTINUANCE OF TRIAL
DATE AND (2) FINDINGS OF
EXCLUDABLE TIME PERIODS PURSUANT
TO SPEEDY TRIAL ACT

**CURRENT TRIAL DATE:
January 14, 2020**

**PROPOSED TRIAL DATE:
March 24, 2020**

Plaintiff United States of America, by and through its counsel
of record, the United States Attorney for the Central District of
California and Assistant United States Attorneys J. Jamari Buxton
and Sarah E. Gerdes, and defendant ANDERSON SAM BONILLA ECHEGOYEN
("defendant"), both individually and by and through his counsel of

1 record, Deputy Federal Public Defender David I. Wasserman, hereby
2 stipulate as follows:

3 1. The Indictment in this case was filed on December 18,
4 2018. Defendant first appeared before a judicial officer of the
5 court in which the charges in this case were pending on February 19,
6 2019. The Speedy Trial Act, 18 U.S.C. § 3161, originally required
7 that the trial commence on or before April 30, 2019.

8 2. On February 19, 2019, the Court set a trial date of April
9 16, 2019.

10 3. As of July 22, 2019, defendant's bond was revoked, and he
11 is currently detained pending trial. The parties estimate that the
12 trial in this matter will last approximately one to two days.

13 4. The Court has previously continued the trial date in this
14 case from April 16, 2019 to January 14, 2020, and found the interim
15 period to be excluded in computing the time within which the trial
16 must commence, pursuant to the Speedy Trial Act.

17 5. By this stipulation, defendant moves to continue the trial
18 date to March 24, 2020. This is the fourth request for a
19 continuance.

20 6. Defendant requests the continuance based upon the
21 following facts, which the parties believe demonstrate good cause to
22 support the appropriate findings under the Speedy Trial Act:

23 a. Defendant is charged with violations of 18 U.S.C.
24 § 1014: False Statement to a Financial Institution; 18 U.S.C.
25 § 1029(a)(2): Use of an Unauthorized Access Device; and 18 U.S.C.
26 § 1028A(a)(1): Aggravated Identity Theft. The government has
27 produced discovery to the defense, including approximately 132 pages
28 of reports, photographs, and criminal history records.

1 b. Defense counsel presently has the following
2 conflicts: United States v. Araiza, 18-870-JFW, a drug trafficking
3 case scheduled for sentencing on January 10, 2020; United States v.
4 Cruz, 19-487-RGK, a drug and firearms trafficking case scheduled for
5 trial on January 21, 2020; United States v. Enriquez, 19-146-GW, a
6 drug trafficking case scheduled for trial on February 4, 2020;
7 United States v. Waggoner, 17-194-SVW-2, a fraud conspiracy case
8 scheduled for trial on February 25, 2020; United States v. Vidrio,
9 18-802-CJC, a drug trafficking case scheduled for trial on March 17,
10 2020; United States v. Peace, 19-203-PSG, a theft of government
11 property case scheduled for trial on April 14, 2020; United States
12 v. Rodriguez, 17-106-FMO-2, a drug trafficking conspiracy scheduled
13 for trial on April 21, 2020; and United States v. Domingo, 19-cr-
14 00313-SVW, a material support for terrorism case scheduled for trial
15 on May 26, 2020. Accordingly, counsel represents that he will not
16 have the time that he believes is necessary to prepare to try this
17 case on the current trial date.

18 c. In light of the foregoing, counsel for defendant also
19 represents that additional time is necessary to confer with
20 defendant, conduct and complete an independent investigation of the
21 case, conduct and complete additional legal research including for
22 potential pre-trial motions, review the discovery and potential
23 evidence in the case, and prepare for trial in the event that a
24 pretrial resolution does not occur. Defense counsel represents that
25 failure to grant the continuance would deny him reasonable time
26 necessary for effective preparation, taking into account the
27 exercise of due diligence. Defense counsel affirmatively represents
28 that he believes the earliest he could be ready for trial is the

1 date requested herein; he does not, and cannot, represent that he
2 will unequivocally be ready on that date.

3 d. Defendant believes that failure to grant the
4 continuance will deny him continuity of counsel and adequate
5 representation.

6 e. The government does not object to the continuance.

7 f. The requested continuance is not based on congestion
8 of the Court's calendar, lack of diligent preparation on the part of
9 the attorney for the government or the defense, or failure on the
10 part of the attorney for the government to obtain available
11 witnesses.

12 g. For purposes of computing the date under the Speedy
13 Trial Act by which defendant's trial must commence, the parties
14 agree that the time period of January 14, 2020 to March 24, 2020,
15 inclusive, should be excluded pursuant to 18 U.S.C.
16 §§ 3161(h)(7)(A), (h)(7)(B)(i), and (h)(7)(B)(iv) because the delay
17 results from a continuance granted by the Court at defendant's
18 request, without government objection, on the basis of the Court's
19 finding that: (i) the ends of justice served by the continuance
20 outweigh the best interest of the public and defendant in a speedy
21 trial; (ii) failure to grant the continuance would be likely to make
22 a continuation of the proceeding impossible, or result in a
23 miscarriage of justice; and (iii) failure to grant the continuance
24 would unreasonably deny defendant continuity of counsel and would
25 deny defense counsel the reasonable time necessary for effective
26 preparation, taking into account the exercise of due diligence.

7. Under the Speedy Trial Act, if the trial is continued to March 24, 2020, the last possible day for trial to commence would be April 7, 2020.

8. Nothing in this stipulation shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods be excluded from the period within which trial must commence. Moreover, the same provisions and/or other provisions of the Speedy Trial Act may in the future authorize the exclusion of additional time periods from the period within which trial must commence.

IT IS SO STIPULATED.

DATED: December 23, 2019

NICOLA T HANNA
United States Attorney

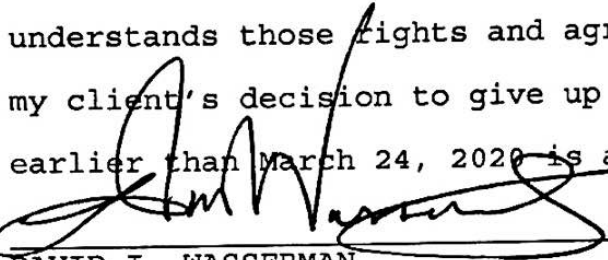
BRANDON D. FOX
Assistant United States Attorney
Chief, Criminal Division

/s/

J. Jamari Buxton
Sarah E. Gerdes
Assistant United States Attorneys

Attorneys for Plaintiff
UNITED STATES OF AMERICA

1 I am ANDERSON SAM BONILLA ECHEGOYEN's attorney. I have
 2 carefully discussed every part of this stipulation and the
 3 continuance of the trial date with my client. I have fully informed
 4 my client of her Speedy Trial rights. To my knowledge, my client
 5 understands those rights and agrees to waive them. I believe that
 6 my client's decision to give up the right to be brought to trial
 7 earlier than March 24, 2020 is an informed and voluntary one.

8 
 9 DAVID I. WASSERMAN
 Deputy Federal Public Defender

Date 12/23/19

10 Attorney for Defendant
 11 ANDERSON SAM BONILLA ECHEGOYEN
 12

13 I have read this stipulation and have carefully discussed it
 14 with my attorney. I understand my Speedy Trial rights. I
 15 voluntarily agree to the continuance of the trial date, and give up
 16 my right to be brought to trial earlier than March 24, 2020.

17 
 18 ANDERSON SAM BONILLA ECHEGOYEN
 Defendant

Date 12/23/19